IN THE UNITED STATES BANKRUPTCY COURT OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CASE NO. 1:23-bk-00737 HWV

LANE ALLEN MAYS, II :

Debtor : CHAPTER 13

MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN

AND NOW comes Debtor, Lane Allen Mays, II, by and through his attorney, Gary J. Imblum, and respectfully represents:

- Debtor filed a Chapter 13 Bankruptcy to the above term and number on April
 2, 2023.
- 2. Debtor filed the bankruptcy as an emergency due to a pending utility shut off scheduled for April 3, 2023 and a sheriff sale of his residence scheduled for April 11, 2023.
- 3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing.
 - 4. Debtor's schedules are due to the Court on or before April 17, 2023.

5. It is estimated that Debtor's counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until May 17, 2023.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.

Gary J. Imblum

DH

Attorney Id. No. 42606

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. 717 558-8990

Email: gary.imblum@imblumlaw.com

Attorney for Debtor

Dated: April 17, 2023

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

JACK ZAHAROPOULOS ESQUIRE **CHAPTER 13 TRUSTEE** VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Bernadette Davis

Bernadette A. Davis, Paralegal **4615 Derry Street** Harrisburg PA 17111 717 238-5250

Fax No. 717 558-8990

Email: gary.imblum@imblumlaw.com

Dated: April 17, 2023

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LANE ALLEN MAYS, II :

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ORDER

Upon consideration of Debtor's Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned pleadings in the above captioned case is extended through May 17, 2023.